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Alan C. Lloyd, Ph.D.  
Agency Secretary  
Cal/EPA



## Department of Toxic Substances Control



Arnold Schwarzenegger  
Governor

5796 Corporate Avenue  
Cypress, California 90630

December 14, 2005

Mr. Michael Evans  
General Manager  
Associated Plating Corporation  
9636 Ann Street  
Santa Fe Springs, CA 90670

ADDITIONAL INVESTIGATION REQUIREMENTS - ASSOCIATED PLANTING  
FACILITY COMPANY, 9636 ANN STREET, SANTA FE SPRINGS, CA 90670

Dear Mr. Evans:

In a letter dated September 20, 2005 (Letter) the Department of Toxic Substances Control (DTSC) transmitted its comments regarding the "Workplan for Additional Investigation (FI Workplan - 2) dated August 19, 2005, prepared by Komex. Our letter required Associated Plating Corporation (Associated) to develop and submit a revised work plan incorporating the comments presented in the Letter.

Associated requested a meeting with DTSC to further discuss DTSC's comments. On November 1, 2005 DTSC met with Associated to discuss DTSC's comments and Associated provided a copy of its "Response to DTSC Comments on Additional Investigation Workplan" (Response) dated November 1, 2005, prepared by Komex. We have reviewed the Response and have the following comments:

1. Comment #1 of the Response states "The revised objectives of this investigation are as follows: to investigate the lateral and vertical extent of soil contamination, to determine if the soil contamination has impacted groundwater, and to perform a risk assessment. The proposed groundwater investigation (presented in comment #7) is consistent with this objective"

In its Response, Associated states the facility overlies groundwater contamination migrating from the Omega Chemical superfund site, which is located about 7,200 feet northeast of the facility, as measured from Figure 11 "Groundwater PCE Concentrations, Omega Superfund Site" presented in the Facilities Investigation Report" (FI Report) dated May 9, 2005, prepared by Komex. At least 12 different chemicals have been detected in soil at the Associated site including cis-1,2-dichloroethene, toluene, xylenes, ethylbenzene, vinyl chloride, 1,1-dichloroethane, 1,2,4-trimethylbenzene, 2-pheylbutane, cymene, isopropyl benzene, PCE, TCE and naphthalene. Figure 11 only presents PCE concentration contours. One grab groundwater sample collected at Associated on February 21, 2002, from boring 10 (B10 – GW) contained vinyl chloride, sec-butyl benzene, tert-butylbenzene, isopropyl benzene, naphthalene, and n-propylbenzene.

The FI Workplan-2 proposes one-time grab groundwater samples be collected from upgradient and downgradient of the site during the next phase of investigation. Since it is agreed that the groundwater beneath Associated is contaminated, a more detailed groundwater investigation and monitoring program is required to determine if soil contamination from each SWMU and AOC has impacted groundwater. Therefore, groundwater samples beneath each solid waste management unit (SWMU) and area of concern (AOC) are required. A minimum of four groundwater monitoring wells are required. One well each at the former PCE AST area, and central storage area, one well down gradient of the batch treatment area and one well down-gradient of the former degreaser and floor trench area. If there are access limitations preventing the instillation of groundwater monitoring wells at a particular SWMU or AOC, then the well for that particular SWMU or AOC can be located a limited distance down gradient. Quarterly groundwater level measurements and sampling is required to evaluate the groundwater flow direction, potential migration from up gradient sources, and contaminant concentrations beneath and down gradient of the site.

Associated is required to collect quarterly groundwater elevation and groundwater quality samples according to the following schedule:

Reporting Period	Sampling Month	Report Due Date
January - March	January	April 29, 2006
April – June	April	July 29, 2006
July – September	July	October 31, 2006
October - December	October	January 31, 2007

The first report is due April 29, 2006. Quarterly groundwater monitoring reports must include a summary of all groundwater elevation measurements relative to mean sea level (msl) and depth to groundwater for all monitoring wells and

presented in tabular form. Provide a plot plan depicting the location of wells and groundwater contours depicting groundwater flow direction, isoconcentration contours for each constituent. We will review the groundwater monitoring reports and determine if additional investigation and/or remediation and monitoring are required.

2. Comment #3a states "Solid Waste Management Units (SWMU) have been highlighted on updated Figures 6, 14, and 15 to clarify which data point is associated with each SWMU." DTSC requested Associated highlight each SWMU and AOC to help organize the existing information and to more easily evaluate the extent of contamination associated with each AOC and SWMU. On updated Figure 6, the former vapor degreaser area is highlighted in yellow, but soil samples collected from the wastewater trench also contained VOCs, which Associated stated during the meeting probably came from the vapor degreaser, however, the trench area is not yellow highlighted. Not highlighting the trench indicates this AOC is separate from the former vapor degreaser. All aboveground and below ground features and all sampling locations where contamination is present should be shaded with the same color to show it is part of the same AOC or SWMU. Associated shall revise the updated figures as needed.
3. Comment #3b states "A cross-section was not previously asked for and is usually done after the investigation has been completed. In addition, only one borehole has been advanced below the concrete pad; therefore, a cross-section below the concrete pad can not be created since more than one borehole is needed to create a cross-section". Figure 4A "Site Conceptual Model And Proposed Operable Units" presented in the FI Report is a cross-section and shows two boreholes (B-10 and MW-11 drilled beneath the concrete pad), potential migration pathways, a sand and gravel unit, extent of fill, concentrations of PCE, trichloroethylene (TCE), 1,2-dichloroethene (1,2-DCE) and vinyl chloride in

groundwater, the water table, concrete section, operable units, and regional groundwater flow direction. In addition, previous investigations provides subsurface information from approximately 26 soil borings locations and approximately 45 soil gas sampling locations. Figure 4A shows the concrete section is consistent across the site and that the soil above the concrete is fill. Associated shall use the information presented in Figure 4A and existing soil and soil gas data to develop cross-sections showing VOC and TPH concentration in soil and soil gas above the concrete section, and below where appropriate. Proposed soil boring and soil gas sampling locations and depths shall also be shown.

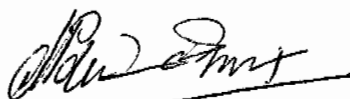
It is important to use all available information to understand the extent of soil and soil gas contamination as this will save time and money developing subsequent investigation, remediation and monitoring plans.

4. Comment #5 states "In fine grained material, as occurs beneath the site, soil sampling has been found to be a better indicator of contamination than soil gas sapling. Therefore, soil sampling has been proposed in the areas where contamination was undelineated in either soil or soil gas as noted in comment #5."

DTSC's request for additional soil gas sampling was not intended to be an indicator of soil contamination, but to measure the concentration of VOCs in the vapor phase. Figure 6 "PCE and TCE in Soil Gas at Five Feet BGS" [revised - transmitted on November 1, 2005] shows vapor-phase PCE in the area of the former PCE above ground storage tank covers an area approximately 35 feet wide by 75 feet long, but the extent to the north has not been defined. Changes to DTSC's "Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air, Interim Final" require adequate vertical and lateral characterization of vapor-phase VOCs and emphasizes that the potential risk associated with inhalation of VOCs be evaluated. Therefore, Associated plating is required to adequately characterize the lateral and vertical extent of VOCs in soil and soil gas.

Please revise the Workplan incorporating the comments listed above and submit the revised workplan to DTSC by December 30, 2005. If you have any questions please contact me at (714) 484-5475 or at [Njohn@dtsc.ca.gov](mailto:Njohn@dtsc.ca.gov)

Sincerely,



Nebu John  
Hazardous Substances Scientist  
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Mr. Michael Evans  
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Page 5 of 5

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